

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

IN RE SONUS NETWORKS, INC.  
LITIGATION

) Civil Action No. 04-10294-DPW  
) (Lead Case)

)

)

THIS DOCUMENT RELATES TO:  
ALL CASES

) **LEAD PLAINTIFF'S UNOPPOSED**  
) **MOTION FOR EXTENSION OF TIME**  
) **TO FILE CONSOLIDATED AMENDED**  
) **COMPLAINT**

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)

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Pursuant to Rule 6(b)(1), Fed.R.Civ.P. and LR, D. Mass. 7.1, Lead Plaintiff BPI Global Asset Management LLP hereby moves for an extension of time, to and including December 1, 2004, to file a Consolidated Amended Complaint. Defendants do not oppose this request. *See* Declaration of Solomon B. Cera (the "Cera Decl."), filed herewith. As set forth below, good cause exists for the requested extension.

By its August 10, 2004 Order the Court established October 12, 2004 as the deadline for Lead Plaintiff to file a Consolidated Amended Complaint. Cera Decl. ¶2. Lead Plaintiff requests an extension of this deadline to allow it sufficient time to fully and completely set forth its claims for relief in this complex securities fraud class action involving accounting misstatements. The claims in this case will cover a two (2) year period of statements (the "Class Period") by defendant Sonus Networks, Inc. ("Sonus") and others, commencing with the filing on March 28,

2002 of Sonus's SEC Form 10-K Annual Report for the year ending December 31, 2001. *Id.* ¶3. The Class Period will likely extend through March 29, 2004 when Sonus announced a delay in the filing of its Amended Annual Report on Form 10K/A for fiscal year 2003. *Id.* On or about July 28, 2004, Sonus restated its financial results for the fiscal years ending December 31, 2001 and 2002 and the nine months ended September 30, 2003. *Id.* The restated results for the second quarter of fiscal year 2003 were published as recently as August 20, 2004. *Id.* There are a multitude of statements which will be challenged as materially false and misleading during this lengthy Class Period. *Id.* In this time period, Sonus also completed two registered offerings of its common stock, on April 22, 2003 and September 24, 2003, further complicating the factual matters at issue. *Id.*

Lead Plaintiff's counsel is working diligently and in good faith to prepare a comprehensive statement of the claims and supporting factual detail, but requires the extension to December 1, 2004. *Id.* ¶4. As noted, there is no opposition to this request. *Id.* Lead Plaintiff will not seek any further extensions to file the Consolidated Amended Complaint. *Id.* ¶5.

Accordingly, Lead Plaintiff requests that the Court extend the time for the filing of a Consolidated Amended Complaint to and including December 1, 2004.

Dated: September 30, 2004

GOLD BENNETT CERA & SIDENER LLP

By \_\_\_\_\_



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